

2009 Criterion Referenced Competency Test (CRCT) Erasure Investigation

AUGUST 2, 2010

PRESENTED TO THE ATLANTA BOARD OF EDUCATION

BY THE BLUE RIBBON COMMISSION

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EXECUTIVE SUMMARY

The Blue Ribbon Commission (the “BRC”) has spent the past 22 weeks investigating the Governor’s Office of Student Achievement (“GOSA”) findings of high erasure data in 58 schools within the Atlanta Public Schools (the “APS”) district. The BRC engaged Caveon Test Security and KPMG LLP to assist in conducting a thorough investigation designed to support reasoned and accurate findings and meaningful recommendations for improvement.

Test Security - The security analysis of written APS testing policies and procedures indicated a “tight” testing environment, which could be improved, but which did not contain significant security policy gaps, although the BRC’s investigative team found that there were inconsistencies in the application of testing policies and procedures. The BRC acknowledged the existence of formal APS test security policies and procedures, but recommended several additional security process improvements for future administrations of the Criteria Referenced Competency Test (“CRCT”).

Erasure Analysis - While GOSA provided APS with baseline erasure analysis information, which identified schools with unusually high incidences of erasures, the BRC conducted further, more statistically detailed erasure analyses to identify schools in which the probabilities of a testing irregularity were the highest. Through this process, the BRC was able to identify a need to conduct further statistical reviews and in-depth in-person interviews with administrators, teachers, parents, and in some cases, students within those schools.

Traditional Investigation - Following the enhanced statistical analysis of APS’ erasure data, the BRC’s next step was conducting a traditional in-person interview-based portion of the investigation. As its next step, the BRC’s Investigative Team conducted a total of 292 interviews spread across each of the identified schools, re-interviewed individuals where additional information suggested a need to do so, reviewed over 50,000 emails and followed up on over 8 tips from telephone hotlines.

Neither the erasure analysis nor the traditional investigation revealed any data or other evidence that there was any district-wide or centrally coordinated effort to manipulate the 2009 CRCT scores and outcomes of students in the 58 APS schools. Additionally, there were no self-admissions by any central office staff, district office staff or school staff of any wrongdoing in connection with the 2009 CRCT. Nevertheless, the BRC was able to make

conclusions based on statistical indicators and qualified allegations of testing irregularities.

This portion of the investigation, however, allowed the BRC to determine that the 58 APS schools could be divided into distinct groupings based upon the frequency and strength of statistical indicators and substantiated and unsubstantiated allegations. The BRC identified these schools by name within the report and recommends appropriate additional follow-up and analysis by APS.

In the course of or during the course of the conduct of the investigation, the BRC identified specific grades and classrooms with significant levels of erasures, score increases and pass/fail reversals resulting from erasures, and high levels of wrong-to-right erasures, or with irregular test outcomes based on the identified erasures. The individuals from these grades and classrooms are being referred to the APS for further investigation and aggressive follow-up.

Leadership Enhancements – The BRC determined that the strength and success of the APS district is directly tied to the strength and success of APS’ leaders. Given the importance of moving forward in a spirit of ongoing improvement, the BRC has recommended the implementation of stronger and more directed and focused leadership skills training and evaluation for all APS administrators, staff and teachers with enhanced emphasis on ethics, accountability and compliance with APS policies.

Summary - The BRC has prepared its report and presented its findings in an effort to expose weaknesses where they exist and recommend enhancements where they are helpful to provide the nearly 45,000 elementary, middle and high school students of APS with the academic preparation needed to move beyond high school and to be assured of their future academic and personal success. It is anticipated that APS’ swift and aggressive action will also serve to enhance the confidence of parents and students of APS.

I. OVERVIEW OF INVESTIGATION

The GOSA conducted a statewide erasure analysis of the Spring 2009 CRCT centered on the number of wrong-to-right (“WTR”) erasures on individual student answer sheets in Reading, English Language Arts (“ELA”), and Mathematics (“Math”). The analysis indicated an unusually high number of WTR erasures for a large number of classes for grades 1-8 in 191 schools located across Georgia. GOSA classified the schools based on the results of its 2009 CRCT erasure analysis as:

- Severe Concern – 25% or more classes flagged
- Moderate Concern – 11% - 24% of classes flagged
- Minimal and Clear of Concern – 0% - 10% of classes flagged

The Atlanta Public Schools system has a total of eighty-four (84) middle and elementary schools. Fifty-eight (58) APS middle and elementary schools were identified by GOSA as Severe or Moderate concern (the “Identified Schools” or the “58 APS Schools”). The remaining twenty-six (26) APS elementary and middle schools were classified as either Minimal Concern or Clear of Concern.

In February 2010, GOSA requested an investigation into all Severe and Moderate Concern schools across the state. GOSA required the districts with schools classified as Severe Concern or Moderate Concern to utilize personnel from the local education agency’s central office, the local board of education, or a qualified third party skilled in audit and fraud examination to conduct an investigation of the unusually high number of WTR erasures in the 2009 CRCT. GOSA’s investigation requirements were set forth in GOSA’s *Components of a Rigorous District-Level Investigation* (“GOSA Investigation Guidelines”), which was delivered to APS in February 2010. To meet the GOSA requirements, APS’ superintendent recommended and the Atlanta Board of Education (the “ABE” or the “Board”) commissioned a Blue Ribbon Commission (“BRC”) to conduct an independent investigation. Independent business and civic leaders, parents, and other community stakeholders were invited to serve as members of the BRC to conduct the investigation. In a March 8, 2010 resolution, the ABE directed the BRC (i) to review current test security protocols and procedures and recommend best-in-class test security practices in time for the 2010 CRCT, (ii) to investigate the high number of WTR erasures in the 2009 CRCT tests in accordance with the GOSA Investigation Guidelines, and (iii) recommend any further investigation or corrective action that APS should undertake based on the findings of the investigation. (See Appendix 1, *Background Materials*)

To assist with this investigation, the BRC determined that it would engage an independent, nationally recognized test audit and security firm to assist the BRC in developing an understanding of the WTR erasure analysis and its implications for all 58 APS schools. The BRC also determined that it would engage an independent, nationally recognized auditing firm with significant forensics investigation expertise to work with the test security company in conducting the investigation. After consideration of a number of candidates for this work, the BRC engaged Caveon Test Security (“Caveon”), an independent, nationally recognized test audit and security firm with expertise in K-12 test irregularities and security analysis, and KPMG LLP (“KPMG”), an independent, nationally recognized auditing firm with significant forensics investigation expertise. KPMG was also one of several firms identified by GOSA as an appropriate selection to conduct the required investigations. Collectively, Caveon and KPMG are referred to throughout this report as the “Investigative Team.”

LIMITATIONS

Data - The investigative team did not have access to either the 2009 CRCT erasure analysis performed by GOSA on all of the state’s schools or the item (test question) level data, which would have allowed the investigative team to perform its analysis with enhanced models. Also, the data provided to the investigative team by GOSA included only the 58 APS Schools, so it was not possible for Caveon to build models of “typical” erasure patterns based on erasures by all APS students at all APS schools.

Caveon was not able to determine the statistical probability of a student’s answering a question on the 2009 CRCT test correctly based on his or her level of proficiency in the subject being tested due to limited access to all test answer sheets and item (test question) level data. An examination of this data could have indicated the probability that a student would change his or her answers from WTR based on his or her responses to questions within the subject (i.e. getting hard questions right while getting easy questions wrong).

Notwithstanding these limitations, the Investigative Team was able to conclude that based on the strength of the data that was available and analyzed, coupled with the information gained through the traditional investigation, the results and findings of the Investigative Team reported to the BRC would not have been materially different.

Traditional Investigation - The BRC had no legal capacity to compel interviews, subpoena specific information such as cell phone records, administer polygraph tests, or initiate or threaten legal or administrative action. In instances where these limitations were significant, the reticence or evasive action or the unavailability of documents or records within an interviewee’s control was taken into consideration in evaluating the results of an in-person interview.

KEY FINDINGS

The following are the key findings from the investigation:

- The investigative team did not find any data or other evidence, nor were there qualified allegations made, that there was any district-wide or centrally coordinated effort to manipulate the 2009 CRCT scores and outcomes of students in the 58 APS schools.
- There were no self-admissions by any central office staff, district office staff or school staff of any wrongdoing in connection with the 2009 CRCT. The investigative team did not uncover any other direct evidence of test irregularities in the form of video or audio recordings or similar evidence.
 - The investigative team became aware of an audio recording in the possession of an individual at one of the 58 APS schools. The individual played the recording for the investigative team but did not release the recording to the investigators. This matter has been shared with the appropriate APS personnel for follow-up.

BRC INVESTIGATION BACKGROUND

The BRC held its initial meeting on March 3, 2010. Since that date the entire BRC met in person 11 times (see Appendix 2, *Meeting Schedule and Minutes*) and subgroups conducted conference calls to prepare for the full group meetings, documents were reviewed by the BRC, and the BRC worked in concert with the Investigative Team. Based on the 22 weeks of work, the BRC reached the findings and recommendations set forth herein. The attached 4 Exhibits and 7 Appendices supplement this report. Readers are encouraged to review all Exhibits and Appendices for a full description of the BRC's investigation, findings and recommendations.

Based upon the directions received from both GOSA and the ABE, the BRC structured its investigation to examine four distinct, but related, areas. The BRC authorized the Investigative Team to conduct the investigation by performing these tasks:

1. Security audit of APS' testing security policies and practices;
2. Statistical analysis of data provided by GOSA and APS;
3. Physical inspection of APS' student answer sheets; and
4. Traditional interviews and email reviews.

For additional information see Exhibit 1, *Methodology*.

II. SECURITY AUDIT

INVESTIGATION ACTIVITY

A critical component of test integrity is the secure handling of testing materials during the annual administration of the CRCT. The BRC determined that a review of APS' test security policies and procedures was essential to a complete investigation.

The Investigative Team performed a comprehensive test security audit of APS. As a result of the review of the written APS test security policies and procedures, Caveon prepared an assessment of APS' test security policies and procedures and, where appropriate, made recommendations for adjustments or improvements in the APS test security policies and procedures. In addition, KPMG identified schools based upon Caveon's data analysis for in-person security reviews by Caveon after the completion of the 2010 CRCT. Caveon visited nine of the Identified Schools to review test security processes and the physical environment. During the visits, Caveon met with school personnel and toured portions of the school facility and various test related spaces within each school.

The BRC considered the Caveon recommendations and on April 2, 2010 referred the recommendations to the ABE and APS in time for implementation for the 2010 administration of the CRCT. All of Caveon's recommendations were accepted by the ABE and APS. Many of the recommendations were implemented by APS for the 2010 CRCT administration. (See Appendix 3, *Test Security Audit*)

INVESTIGATION FINDINGS

Following is the BRC's summary of a portion of Caveon's test security audit findings:

- Current written APS testing policies and procedures are well-defined and established a strong framework for a highly controlled testing environment from receipt to return of tests to the state.
- Caveon identified several protocols that can be improved and made high, medium and low priority recommendations for such improvements to the ABE and APS.
- All of the recommendations for improvement in test security made by Caveon were adopted by the BRC and referred to the ABE and APS and adopted by the ABE and APS. Several were implemented to enhance the integrity of the 2010 CRCT. The ABE has advised the BRC that all remaining recommendations were adopted prior to the Summer 2010 CRCT retest or will be adopted prior to the Spring 2011 CRCT.
- Based on interviews, KPMG determined that there were inconsistencies in the application of the written test security policies and procedures and with security

access within and across the 58 APS schools. KPMG concluded that compliance with test security policies and procedures appears to vary materially among individual schools.

SECURITY RECOMMENDATIONS

In response to this investigation, the BRC makes the following test security recommendations, which should be considered in time for implementation prior to the 2011 CRCT administration:

- Implement a well-defined program for follow-up and continued monitoring of CRCT test security. A commitment by APS to a thorough follow-up should be formal and public. These efforts should be implemented by the next testing period if possible and evaluated subsequently for effectiveness.
- Research and identify causes of the unusually high number of erasures within the district and identify and implement best practices in test preparation across the district.
- Reinforce APS' testing policies and procedures, and ensure that all appropriate training takes place for employees involved in the administration of the CRCT.
 - Communicate a policy that emphasizes ethics and accountability for adherence to the policies and training requirements -- as well as the ramifications for violating such policies and requirements.
 - Formally document any policy or schedule changes related to CRCT test materials (i.e., changes in return time or dates of the delivery of the CRCTs to/from the Brewer Test Center).
- Establish a test security plan and ongoing budget for test security.
- Implement annual compliance and ethics certifications and approvals (for all employees involved in testing— including central office personnel, teachers, test coordinators, assistant principals, principals, and School Reform Team executive directors).
- Establish ongoing external monitoring and reporting for standardized testing at all APS schools.

III. ERASURE ANALYSIS

Investigation Activity

Caveon performed an in-depth 2009 CRCT erasure data analysis of all classrooms in the 58 Identified Schools. Caveon designed its analysis to identify statistical indicators of testing irregularities based on four statistics: high number of erasures; number of WTR erasures; score increases/decreases due to erasures; and pass/fail reversals due to erasures. As a component of this data analysis, Caveon also visited the Georgia Department of Education's testing contractor, CTB/McGraw Hill, in Indianapolis, Indiana to physically examine erasures on individual student answer sheets in an effort to identify any potential patterns, test-taking strategies, etc. that may indicate possible testing irregularities.

Utilizing the data provided by APS and GOSA, Caveon used four statistical formulas to determine the probability of a testing irregularity for each school, each grade in the school, and each classroom in the school. Based on this statistical review of schools, grades and classrooms Caveon created the "Caveon Index." The Caveon Index indicates the overall probability that test outcomes - given the erasure patterns - were random. Assuming the tests were normally administered, Caveon was able to assess the degree of unusual data or patterns that were present in the schools, grades and classrooms using a probability value. The probability that a test outcome is random is expressed using a numerical index¹. High index values indicate unusual data that are indicative of possible testing irregularities. For example, an index value of 4.0 corresponds to a probability of one in ten thousand that a certain event would naturally occur and an index value of 6.0 corresponds to a probability of one in one million that a certain event would naturally occur. (See Appendix 4, *Categorization of Erasure Analysis Results*, the "Caveon Report"). The 4.0 cut-off was selected because any lower values would increase the likelihood of greater false positives (i.e. including individuals that are not involved in any wrongdoing).

Caveon used this process to develop a Caveon Index for schools, grades and classrooms. As described above and depicted below, the Caveon Index was used as one factor in dividing the Identified Schools into categories representing severity of possible testing irregularities. Administrators and educators were also assigned a Caveon Index based on their association with a high Caveon Index school.

¹ The mathematical relation between the index and the probability is: $probability = 10^{-index}$.

Caveon Index Probability

Caveon Index	Probability
0.0 - 3.9	1 in 1 chance to 1 in 9,999 chance
4.0 - 6.9	1 in 10,000 chance to 1 in 9,999,999
7.0 - 55.0	1 in 10,000,000 chance and above.

Source: Caveon

In addition to creating the statistical Caveon Index, Caveon compiled detailed notes of erasure anomalies or characteristics for each Identified School. Caveon's notes detail high erasures, anomalous grades, grade increases, anomalous teachers and anomalous classroom score increases which were in some instances considered to be indicative of possible testing irregularities.

INVESTIGATIVE FINDINGS

Based on the Caveon Index, specific schools, grades and classrooms were "flagged" if the data analysis reflected that there were statistical anomalies that indicated possible testing irregularities. Because the test results for each subject area were evaluated using four statistical indicators, a school, grade, or classroom could receive from none to twelve different flags. The larger the number of flags and the larger size of the Caveon Index, the stronger the evidence of a testing irregularity. (See Appendix 4, pages 4-5.)

IV. INTERVIEWS AND INVESTIGATIONS

KPMG, working with Caveon, conducted a traditional investigation. This portion of the investigation included interviews of APS personnel in the central office and at individual schools, document reviews (see Appendix 5, *Document Review*), reviews of electronic communications such as emails and the review of information from APS and specially established “hot lines.” KPMG was given latitude to request permission from the BRC to investigate other matters as they considered necessary related to the administration of the 2009 CRCT.

At the onset of the interview phase of the investigation, Caveon and KPMG divided the Identified Schools into two groups based on the results of the Caveon Report (see Appendix 4) for purposes of prioritizing interviews and other investigative efforts. The first group included 27 schools listed in Tables 1 through 4 in the Caveon Report, pages 6-14. (“Group One Schools”) The data in the Caveon Report suggested potential testing irregularities were more probable in those schools. The Group One Schools were assigned to KPMG (with assistance from Caveon in certain cases) for in-depth personal interviews. The second group included the 31 schools listed in Tables 5 through 8 in the Caveon Report, pages 15-18 (“Group Two Schools”). The data in the Caveon Report suggested potential testing irregularities were not as probable in those schools. APS and KPMG personnel were assigned to conduct the in-depth personal interviews in the Group Two schools. The BRC authorized the use of APS personnel to conduct interviews in the Group Two schools to complete the interview phase of the investigation in a timely manner.

KPMG conducted and oversaw 292 interviews of various APS personnel, including central office staff, district level staff, and school staff, as well as ABE members and parents/students, with the assistance of Caveon and APS. A total of 242 interviews were conducted at the school level: 102 interviews by KPMG and Caveon; 75 interviews by KPMG and APS; and 65 interviews by APS under the direction of KPMG. Additionally, KPMG conducted 15 central office interviews, 3 ABE interviews, 12 student and parent interviews, and 20 re-interviews. To ensure the interview process was thorough and unbiased, KPMG developed a prepared script, which was followed in each interview.

KPMG also reviewed email communications for 70 individuals consisting of approximately 50,000 individual emails and reviewed all reports provided by APS of possible testing irregularities from the APS hotline, an independent hotline, and the GOSA.

APPROACH

The traditional investigation (document review, email review and interviews) identified allegations of misconduct and policy and procedure violations during the administration of

the 2009 CRCT. The BRC and KPMG labeled each such allegation as either a “Qualified Allegation” or a “Matter.” (See Appendix 6, *Interview Process and Summaries*)

A *Qualified Allegation* is an allegation of a specific situation in which cheating is alleged to have occurred during the 2009 CRCT administration and data exists which tends to support the allegation. The allegation may implicate a specific school, individual or classroom.

A *Matter* is:

- An allegation which does not rise to the level of a Qualified Allegation because the allegation relates to a non-specific situation in which cheating is alleged to have occurred during the administration of the 2009 CRCT or because there is no data to support the allegation;
- Possible policy and procedure violations in handling, administration, and or training related to the 2009 CRCT;
- Interview discrepancies;
- Lack of response or refusal to answer specific questions posed by the interviewers regarding 2009 CRCT test administration; or
- Caveon Index of 3.0-3.9.

APS employees have been referred to APS for further action to the extent they are the subject of either a Qualified Allegation or Matter. Those employees who are subjects of Qualified Allegations are referred to APS for further investigation. All Matters are considered internal violations of APS personnel, policy, procedure, and protocol standards and will be referred to APS for its consideration and any further action it deems necessary.

V. BRC ANALYSIS

SCHOOLS – CATEGORY I

Based upon the Erasure Analysis Results in the Caveon Report and the results of the traditional investigation, the BRC assessed each of the Identified Schools and divided the schools into three categories. Category I schools are those schools identified as having a Caveon Index of 7.0 or greater. These schools have a minimum of 1 in 1,000,000,000,000 chance of their results occurring randomly. The Caveon Index for Category I schools is indicative of potential testing irregularities during the 2009 CRCT. In Category I schools the statistical indicators are substantially school-wide. The elements that make up the Caveon Index of testing irregularities were either spread across several grades, classrooms or subjects or were concentrated in a single grade level or subject matter. The 12 schools in this category are listed in Table A.

INDIVIDUALS – CATEGORY I

There are 78 individuals (30 administrators and 48 educators) [see Exhibit 4] within these 12 schools who are being referred for further investigation by APS based on a school, grade and classroom Caveon Index of 4.0 or greater or the existence of a Qualified Allegation associated with the individual administrator or teacher. Some administrators are being referred based only on their association with a school with a high Caveon Index. (See Appendix 4, pages 6-11.)

Table A
Category I Schools

Schools	Caveon School Index	Grade and Classroom Flags	Qualified Allegations
Gideons Elementary	53.6	Yes	No
Usher Elementary	39.4	Yes	No
Peyton Forest Elementary	31.2	Yes	No
Perkerson Elementary	26.6	Yes	No
Venetian Hills Elementary	22.8	Yes	Yes
Scott Elementary	19.4	Yes	No
Connally Elementary	18.5	Yes	Yes
Dunbar Elementary	17.6	Yes	No
Parks Middle	16.3	Yes	No
F. L. Stanton Elementary	16.1	Yes	No
Capitol View Elementary	14.1	Yes	No
Blalock Elementary (closed in 2009)	12.2	Yes	No

Source: Caveon, KPMG

SCHOOLS – CATEGORY II

Category II schools are those schools identified in the Caveon Report as having either anomalous grades, grade increases or anomalous teachers. The 13 schools in this category are listed in Table B. The Caveon Index for the Category II Schools is indicative of potential testing irregularities during the administration of the 2009 CRCT, although the evidence is not as strong for these schools as for the Category I Schools. In placing schools in Category II, the BRC also considered the Qualified Allegations and Matters with respect to these schools. Unlike Category I schools, the evidence of irregularities in Category II schools is not indicative of any school-wide problem.

INDIVIDUALS – CATEGORY II

There are 25 individuals (8 administrators and 17 educators) [see Exhibit 4] within these 13 schools who are being referred for further investigation by APS based on a grade or classroom Caveon Index of 4.0 or greater or the existence of a Qualified Allegation associated with the individual administrator or teacher. Some administrators are being referred based only on their association with a school with a high Caveon Index. (See Appendix 4, pages 12-14)

Table B
Category II Schools

Schools	Grade Flags	Classroom Flags (Over 4 Caveon Index)
Benteen Elementary	4	3
Coan Middle	2	4
Cook Elementary	1	0
Fain Elementary	0	2
Harper Archer Middle	2	1
Kennedy Middle	4	2
Slater Elementary	3	3
Towns Elementary	3	0
Turner Middle	1	0
West Manor Elementary	1	0
White Elementary	4	0
Whitefoord Elementary	1	0
Woodson Elementary	1	0

Source: Caveon, KPMG

SCHOOLS – CATEGORY III

Category III schools are those schools characterized by minimal Caveon Index values and by the absence of any Qualified Allegations. The 33 schools in this category are listed in Table C.

INDIVIDUALS – CATEGORY III

There are 6 individuals (2 administrators and 4 educators) [see Exhibit 4] within these 33 Category III schools that are being referred for further investigation by APS based on a classroom Caveon Index of 4.0 or greater or the existence of a Qualified Allegation associated with the individual administrator or teacher. (See Appendix 4, pages 15-18)

Table C
Category III Schools

Schools	
Adamsville Elementary	Heritage Academy
Beecher Hills Elementary	Herndon Elementary
Benjamin S. Carson	Humphries Elementary
Bethune Elementary	Hutchinson Elementary*
Bolton Academy	Imagine Wesley Academy
Boyd Elementary*	Kimberly Elementary
C W Hill Elementary	Long Middle
Cascade Elementary	M A Jones Elementary
Cleveland Elementary	Miles Elementary
Crim High School (8th grade)	Parkside Elementary
D. H. Stanton Elementary	The Bridge
Deerwood Academy	Thomasville Heights Elementary
Dobbs Elementary	Toomer Elementary
East Lake Elementary	University Community
Fickett Elementary	Williams Elementary
Finch Elementary	Young Middle
Grove Park Elementary	

Source: Caveon, KPMG

** Boyd Elementary and Hutchinson Elementary are in Category III but neither school had multiple grades or classrooms with a Caveon Index of 4.0 or higher; however, they each had a single classroom with a Caveon rating of 4.0 or higher. Those classrooms are referred for further investigation.*

Details on individual schools are available in Exhibit 2, *School Summaries* and Exhibit 3, *CRCT Analysis*. A breakdown of referrals is included in Exhibit 4, *Referrals for Further Investigation*.

VI. BRC PROCESS RECOMMENDATIONS

The BRC believes that its investigation and analysis will assist APS and the ABE to develop a plan and protocol for addressing testing irregularities that have occurred and for preventing future testing irregularities. To aid APS and the ABE in this effort, the BRC has developed a set of recommended actions based on the BRC investigation. If adopted and implemented, these efforts should be evaluated periodically for effectiveness and adjusted as appropriate.

Follow-Up Recommendations

- Commit publicly to aggressively follow-up on the results of the investigation by establishing a well-defined plan to consider the findings and recommendations in this report, conduct additional investigations where necessary, and take whatever administrative, legal, and professional action that APS considers appropriate. The plan should include a project leader, clear objectives, work plan, schedule, and deliverables.
- Conduct further investigation of the referred individuals within the Identified Schools and take whatever administrative, legal, or professional action APS considers appropriate.
- Conduct an analysis of individual student performance of those students APS determines may have been impacted by testing irregularities to determine if additional academic assistance and support are needed. If support is warranted, immediate action should be taken to mobilize appropriate assistance for the students for as long as necessary.
- Develop protocols to pro-actively conduct erasure analysis after future CRCT administrations.
- Develop regular internal audit routines for each administration of the CRCT focused on: test security protocols; test administration; test irregularities; and detailed APS erasure analysis.
- Document any testing irregularities identified and specific plans for follow-up and resolution, including referrals to the Georgia Professional Standards Commission and/or the Fulton County District Attorney's Office, as appropriate.

VII. DISTRICT-WIDE LEADERSHIP IMPROVEMENT

As the Chief Executive Officer, it is essential for the Superintendent to make sure that APS principals and other leaders create an environment where personal accountability, ethical behavior, and positive peer support are the norms. Because of the number of apparent testing irregularities in connection with the 2009 CRCT, the BRC recommends that the Superintendent perform a comprehensive re-evaluation of the leadership skills and competencies included in individual performance plans for all system leaders, with an emphasis on ethics, accountability and staff performance. The Superintendent should also examine appropriate methodologies for assessing leadership competency relative to the areas of focus.

APS should expand evaluation and assessment plans to ensure the effectiveness of APS principals, assistant principals, curriculum leaders, School Reform Team executive directors and test coordinators. Such plans should be incorporated directly into the current APS evaluation process and supplemented with additional methods that assess leadership performance. Through an enhanced monitoring process, supervisors would report performance deficiencies to the Superintendent in a pre-defined process that identifies the performance and/or leadership deficiencies and facilitates remediation efforts.

To ensure effective assessment and development planning, emphasis should be placed on those key leadership skills and competencies that can be appropriately observed and measured. The BRC recommends that APS:

- Drive culture change throughout the district to create an environment that effectively balances attention to measurable student outcomes with attention to positive, ethical behavior. Proactively re-assess incentive systems and performance evaluation processes for all district employees with a focus on achieving this appropriate balance.
- Establish annual goals and performance plans (for principals, assistant principals, curriculum leaders, School Reform Team executive directors and central office personnel) that include a significant emphasis on leadership, integrity, and ethics.
- Incorporate self-assessment into the annual plan evaluation processes for leadership (i.e. principals, assistant principals, curriculum leaders, School Reform Team executive directors and central office personnel).

- Incorporate surveys of teachers and support staff into annual performance planning for principals to provide qualitative evidence on principal performance.
- Provide observations of principals, which may include shadowing or other efforts, for assessments of leadership ability compared to the critical skills determined for the position. Incorporate data on observed behaviors into the annual assessment process for leaders to assess their competency relative to those skills deemed to be critical for each position.
- Provide opportunities for regular, anonymous peer and upward feedback (i.e. teacher-to-teacher, teacher-to-assistant principal/principal, teacher-to-test coordinator, principal-to-executive director) as well as processes for following through and managing this information.
- Conduct principal peer reviews and incorporate this information into annual evaluation processes.
- Provide to the ABE additional recommendations on plans to monitor the principals and other leaders of the schools being referred by the BRC.
- Reinforce and publicize externally and internally APS' policies that protect APS employees who report misconduct or violations from reprisals, retaliation, and other hostile workplace actions.
- Publish additional findings made with respect to events that may have occurred during the 2009 testing period.
- Given that the findings relate to events that may have occurred during the 2009 CRCT and that personnel changes may have occurred since that time period, APS must provide appropriate support for the implementation of recommendations by the current leadership of schools.

VIII. Comparisons from 2010 CRCT Administration

In June 2010, APS provided the Investigative Team with preliminary results of the 2010 CRCT in the 58 Identified Schools. The comparison of the 2009 and 2010 CRCT results was used by the BRC as an additional data point in support of its findings and recommendations. (See Appendix 7, *2010 CRCT Analysis and Comparison*)

The following key findings are made with respect to the 2010 CRCT and a comparison of 2009 and 2010 CRCT scores:

- The Investigative Team's analysis of the 2010 CRCT confirmed the BRC findings of higher anomalies than usual with respect to the 12 schools in Category I.
- Given the high number of declines in Math, the BRC recommends that APS conduct a broad assessment of Math outcomes to further determine the root causes of the declines. This assessment should include, but not be limited to, a review of the curriculum and schools/teachers where the declines were most dramatic, as well as an assessment of the effectiveness of current teaching methods.
- There are 33 schools that demonstrated a significant decline in 2010 CRCT test results. The BRC computed this number by looking at two factors - - the number of declines in grade/subject combinations, as well as 10% or greater increase in failure rates. The BRC recommends that the District conduct a further in-depth assessment in these schools.

IX. Closing Statement

The BRC has prepared this report and presented its findings in an effort to expose weaknesses where they exist and recommend enhancements intended to help APS address testing misconduct, improve operations, strengthen organizational leadership and better serve its students.

It is, however, the APS students directly impacted by possible testing misconduct that are of the greatest concern to the BRC. APS must move quickly and aggressively to remedy any and all testing irregularities and to prevent future such occurrences. APS must also begin the work necessary to rebuild the public's confidence in its school system. The first step in this rebuilding process is to immediately work to provide the nearly 45,000 elementary, middle and high school students of APS with the academic preparation needed to move beyond high school academically and prepare them to enter the next phase of life. In this regard, it is essential that APS identify students who may need additional academic assistance and to utilize all available resources to provide that assistance.

The 2009 CRCT erasure investigation results offer APS the opportunity to take the lead in establishing best in class test security practices. It is the BRC's hope that APS and the ABE will work together to do what must be done to support our students and their academic success.